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12 ALLIED COLLECTION SERVICES, INC.

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

29  
30 Abilio Hernandez,  
31 Plaintiff,  
32 vs.  
33 Allied Collection Services, Inc.,  
34 Defendant.

35 Case No.: 2:19-cv-00291-JCM-VCF

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1           2. The last date to file dispositive motions is continued from December 6, 2019, to  
2           **March 6, 2020**; and

3           3. The last date to file the proposed joint pretrial order from January 6, 2020, to  
4           **April 6, 2020**.

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6           Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The Parties have  
7           been diligent in propounding discovery. Furthermore, Plaintiff has already taken Defendant's  
8           deposition under Rule 30(b)(6) and Defendant has taken Plaintiff's deposition. Plaintiff intends  
9           to depose a fact witness and possibly re-open the deposition of Defendant. The Parties also  
10           disclosed experts. Due to conflicting schedules various witnesses and the Parties' counsel, the  
11           Parties are unable to complete outstanding depositions by the current Discovery Cut-off Date of  
12           November 7, 2019. Furthermore, due to holidays and previously scheduled personal and  
13           business matters, the Parties request that discovery and related dates be extended until after the  
14           new year.

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16           Additionally, the Parties are actively engaged in discussions that may potentially resolve  
17           this case.

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19           This request for extension of deadlines is made specifically in this fee-shifting matter  
20           since depositions and experts are a significant expense. The Parties therefore seek to extend the  
21           discovery deadlines by approximately 90 days.

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23           Pursuant to LR 26-4(a), Plaintiff has propounded written discovery requests on Defendant  
24           and has taken Defendant's Rule 30(b)(6) deposition. Defendant has propounded written discovery  
25           requests and has taken Plaintiff's deposition.

26           Pursuant to LR 26-4(d), the Parties propose the following discovery schedule:

27           (1) Last date to complete discovery: January 20, 2020;

- (2) Last date to file dispositive motions: March 6, 2020; and
- (3) Last date to file the proposed joint pretrial order: April 6, 2020.

For these reasons, the Parties jointly request that this Court modify the Scheduling Order to provide an additional 90 days to complete discovery, and the in the ordinary course file dispositive motions, and the proposed joint pretrial order as described in the proposed timeline above.

This is the Parties' second request for an extension of these deadlines.

DATED this 4<sup>th</sup> day of November 2019.

Respectfully submitted,

## KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce

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CARLSON & MESSER LLP

By: /s/ David Kaminski

David Kaminski, Esq.  
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Attorneys for Defendant Allied Collection Services, Inc.

## ORDER

IT IS HEREBY ORDERED that the Order, ECF No. 27, is modified to extend the discovery deadlines as follows:

- (1) Last date to complete discovery: **January 20, 2020**;
- (2) Last date to file dispositive motions: **March 6, 2020**;
- (3) If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after the decision on the dispositive motions or further court order, and
- (4) If no dispositive motions are filed, the last date to file the proposed joint pretrial order: **April 6, 2020**.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE  
November 15, 2019  
Dated:

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on November 6, 2019, the foregoing stipulation was filed and served via CM/ECF to all parties appearing in this case.

**CARLSON & MESSER LLP**

By: /s/ David Kaminski  
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